

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE NATIONAL COLLEGIATE  
ATHLETIC ASSOCIATION STUDENT-  
ATHLETE CONCUSSION INJURY  
LITIGATION**

**MDL No. 2492**

**Master Docket No. 1:13-cv-09116**

**This Documents Relates To:  
All Cases**

**Judge John Z. Lee**

**Magistrate Judge Geraldine Soat Brown**

**UNOPPOSED MOTION FOR LEAVE TO FILE  
OVERSIZED COMBINED REPLY BRIEF**

Lead Objector Anthony Nichols (“Nichols”), by and through his counsel, respectfully moves the Court for leave to file a combined reply brief, of up to 30 pages in length, in support of his second objection to the pending Motion for Preliminary Approval of Class Settlement. In support of this motion, Nichols states as follows:

1. On May 14, 2015, the Court directed Nichols to file a brief in response to the pending Motion for Preliminary Approval of Class Settlement, addressing the viability of a Rule 23(b)(3) personal injury damages class (the “Second Objection”). (Dkt. 182).
2. On July 22, 2015, the Court granted Nichols’ unopposed motion for leave to file a 35-page brief for his Second Objection, and also granted the NCAA leave to file a 35-page responsive brief. (Dkt. 203.)
3. On September 14, 2015, Interim Lead Counsel and the NCAA filed separate briefs responding to Nichols’ Second Objection. (Dkts. 218, 222.)
4. Pursuant to the Court’s September 25, 2015 Order, Nichols’ reply briefing in

support of his Second Objection is due by October 12, 2015. (Dkt. 229.)

5. For the sake of efficiency and to limit the number of filings on the Court's docket, Nichols has drafted a single, combined reply memorandum, which responds to the issues raised by both Interim Class Counsel's and the NCAA's briefs submitted in response to the Second Objection. Nichols in good faith believes that he can present his combined reply brief in 30 pages or less.

6. Nichols' counsel conferred with Interim Class Counsel and counsel for NCAA on October 9, 2015. Neither Interim Class Counsel nor counsel for NCAA opposes this motion.

7. Accordingly, Nichols respectfully submits that good cause exists for the requested page extension.

WHEREFORE, Anthony Nichols respectfully requests leave to file a combined reply brief, of up to 30 pages in length, in support of his second objection to the pending Motion for Preliminary Approval of Class Settlement, along with such further relief as this Court deems equitable and just.

Respectfully submitted,

**ANTHONY NICHOLS**

By: /s/ Ari J. Scharg  
One of his Attorneys

Jay Edelson  
jedelson@edelson.com  
Rafey S. Balabanian  
rbalabanian@edelson.com  
Ari J. Scharg  
ascharg@edelson.com  
Benjamin S. Thomassen  
bthomassen@edelson.com  
EDELSON PC  
350 N. LaSalle, Suite 1300  
Chicago, Illinois 60654

Tel: 312.589.6370  
Fax: 312.589.6378

**CERTIFICATE OF SERVICE**

I, Ari J. Scharg, an attorney, hereby certify that on October 12, 2015, I served the above and foregoing ***Unopposed Motion for Leave to File Oversized Combined Reply Brief***, by causing true and accurate copies of such paper to be filed and transmitted to all counsel of record via the Court's CM/ECF electronic filing system.

/s/ Ari J. Scharg\_\_\_\_\_